



Arnold B. Calmann  
(973) 645-4828  
[abc@saiber.com](mailto:abc@saiber.com)

January 22, 2018

**BY CM/ECF AND FEDERAL EXPRESS**

The Honorable Claire C. Cecchi, U.S.D.J.  
United States District Court  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

The Honorable Dennis M. Cavanaugh, Ret. U.S.D.J.  
McElroy, Deutsch, Mulvaney & Carpenter, LLP  
1300 Mount Kemble Avenue  
Morristown, NJ 07962-2075

**Re: *IQVIA Inc., et al. v. Veeva Systems Inc.***  
**Civil Action No. 2:17-cv-00177-CCC-MF**

Dear Judge Cecchi and Judge Cavanaugh:

We, along with our co-counsel Kellogg Hansen Todd Figel & Frederick PLLC and Wilson Sonsini Goodrich & Rosati PC, represent defendant and counterclaim-plaintiff Veeva Systems Inc. ("Veeva") in the above matter. We write jointly with plaintiff IQVIA (formerly IMS) to respond to the Court's direction in its January 10, 2018 Order for a report as to whether any conflict exists arising from the Court's appointment of Judge Cavanaugh as special discovery master in this matter.

The parties are pleased to report that they have no apparent, potential, or actual conflict of interest relating to Judge Cavanaugh's appointment. Accordingly, the parties are prepared to move forward in this matter, and to schedule a conference with Judge Cavanaugh at his earliest convenience.

We thank the Court for its consideration and assistance in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Arnold B. Calmann". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Arnold B. Calmann

cc: Counsel of record